

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	<b>Case No. 3:19cr130</b>
	)	
<b>OKELLO T. CHATRIE,</b>	)	
<b>Defendant</b>	)	

**JOINT STATEMENT ON POTENTIAL GOOGLE OBJECTIONS**

Okello Chatrie, through counsel, has now conferred twice with counsel for the government and counsel for Google regarding counsel for Google's reservation in ECF No. 167 regarding potential attorney-client privilege objections. The parties and Google submit the following joint statement:

1. Based on defense counsel's representations that they intend to question Mr. McGriff and Ms. Rodriguez about the topics in the Google employees' previously filed declarations and the unredacted portions of the publicly available documents identified as defense exhibits submitted in ECF No. 165, counsel for Google represent that Google does not anticipate asserting any objections based on attorney-client privilege in regard to those topics.
2. Counsel for Google further do not intend to request the ability to consult with their clients during their clients' testimony. Thus, the Google employees will be able to comply with the standard sequestration order for all witnesses, which would bar all witnesses—except for the parties' designated advisory witnesses—from listening to any other witness's testimony and from discussing their testimony with any other individual until the conclusion of the evidence.

Respectfully submitted,

OKELLO T. CHATRIE

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